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Attorneys for Defendant  
Global Pro System, Inc.

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

KASSIE MERRITT, individually and  
behalf of all others similarly situated,

Plaintiff,

v.

YAVONE LLC, a California limited  
liability company, HEALTH CHOICE  
LABS, LLC, a Nevada limited liability  
company, and GLOBAL PRO SYSTEM,  
INC. a Nevada corporation,

Defendants.

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CV No. 6:15-cv-00269-TC

DEFENDANT GLOBAL PRO SYSTEM,  
INC.'S UNOPPOSED MOTION TO EXTEND  
TIME TO APPEAR

**LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7-1, the undersigned certifies that the counsel for Global Pro System, Inc. ("Global Pro") conferred with counsel for plaintiff and that plaintiff's counsel does not oppose the extension requested in this motion.

**MOTION**

In accordance with Federal Rule of Civil Procedure 6(b), Global Pro moves the court for an order granting it an extension of time to April 27, 2015, in which to respond to the complaint, without prejudice to Global Pro's right to file a motion seeking dismissal.

**MEMORANDUM OF LAW**

Plaintiff filed its complaint on February 17, 2015. Based on a date of service of February 20, 2015, Global Pro's response to the complaint would be due on March 13, 2015. Miller Nash Graham & Dunn LLP was only recently retained as local counsel.

This is Global Pro's first request for an extension. This motion is not made for purposes of delay. Global Pro does not waive any objections, defenses, motions, responses, or claims it may have in this action by filing this motion, including but not limited to any defenses as to personal jurisdiction, statute of limitations, or otherwise.

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**CONCLUSION**

Global Pro respectfully requests an extension of time to respond to the complaint to April 27, 2015.

DATED this 13th day of March, 2015.

MILLER NASH GRAHAM & DUNN LLP

/s/ Jonathan H. Singer

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I hereby certify that I served the foregoing Defendant Global Pro System, Inc.'s

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*Attorney for Plaintiff Kassie Merritt*

by the following indicated method or methods on the date set forth below:

- ☒ **CM/ECF system transmission.**
- ☐ **E-mail.** As required by Local Rule 5.2, any interrogatories, requests for production, or requests for admission were e-mailed in Word or WordPerfect format, not in PDF, unless otherwise agreed to by the parties.
- ☐ **Facsimile communication device.**
- ☐ **First-class mail, postage prepaid.**
- ☐ **Hand-delivery.**
- ☐ **Overnight courier, delivery prepaid.**

DATED this 13th day of March, 2015.

/s/ Jonathan H. Singer

Jonathan H. Singer, OSB No. 105048

*Of Attorneys for Defendant Global Pro System,  
Inc.*